

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**RU-EL SAILOR,**

Plaintiff,

-vs-

**CITY OF CLEVELAND, *et al.*,**

Defendants.

Case No. 1:20-cv-00660

Judge David A. Ruiz

**PLAINTIFF’S UNOPPOSED  
MOTION FOR EXTENSION OF  
DEADLINES (90 DAYS)**

Plaintiff, through counsel, respectfully requests a ninety-day extension of time for all existing deadlines in this case. This Motion is unopposed.

On June 20, 2024, the Court issued an order amending existing deadlines. (Dkt. 80). On July 17, 2024, counsel for Plaintiff filed their Motion to Withdraw. (Dkt. 82). In the Motion, counsel requested that the Court stay the case for six months to permit Plaintiff to obtain new counsel. That motion remains pending as case deadlines approach. Therefore, Plaintiff respectfully requests that the Court amend the current case calendar by adding ninety days to all existing case deadlines:

|   | <b>Current Deadline</b> | <b>Proposed New Deadline</b> |
|---|-------------------------|------------------------------|
| <b>Fact Discovery</b>                       | August 19, 2024         | November 19, 2024            |
| <b>Plaintiff Expert Disclosures/Reports</b> | October 16, 2024        | January 16, 2025             |
| <b>Defense Expert Disclosures/Reports</b>   | November 18, 2024       | February 18, 2024            |
| <b>Expert Discovery</b>                     | December 16, 2024       | March 16, 2024               |
| <b>Dispositive Motion Deadline</b>          | January 15, 2025        | April 15, 2025               |

Undersigned counsel conferred with counsel for all Defendants, and Defendants do not object to this Motion.

This request is made in good faith and for good cause, will not unfairly prejudice any party, and has not been made for the purpose of undue delay or harassment.

Respectfully submitted,

s/ Jacqueline Greene

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### **CERTIFICATE OF SERVICE**

I hereby certify that on July 24, 2024, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/Jacqueline Greene  
*One of the Attorneys for Plaintiff*